

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

Annual Review of Base Rates for Fuel Costs                    )  
of South Carolina Electric & Gas Company                    )           Docket No. 2015-2-E

**PETITION TO INTERVENE OF  
CMC STEEL SOUTH CAROLINA**

CMC Steel South Carolina (“CMC”) hereby petitions to intervene as a party of record in the above-captioned proceeding. CMC states the following grounds in support of its petition.

1)       CMC owns and operates a steel manufacturing facility in Cayce, South Carolina. This facility utilizes an electric arc furnace (“EAF”) to melt and recycle steel. This process requires CMC to purchase very large quantities of electricity from South Carolina Electric & Gas Company (“SCE&G”) at a cost of millions of dollars per year. Because the cost of electricity is one of the major costs of steel-making utilizing an EAF, the cost of electricity directly affects CMC’s ability to produce steel at a competitive price. CMC is one of the largest retail customers of SCE&G.

2)       Due to the magnitude and unique characteristics of its load, CMC cannot be adequately represented by any other party to this proceeding. At this stage of the proceeding, CMC has not fully determined what positions it may take.

3)       CMC’s mailing address is:

CMC Steel South Carolina  
310 New State Road  
Cayce, SC 29033

4)       CMC Steel is represented by Damon E. Xenopoulos, Esq. and other attorneys with the law firm of Brickfield, Burchette, Ritts & Stone, P.C. in various matters regarding electric rates and service. In the past few years, attorneys of the firm have appeared before this Commission, the Federal Energy Regulatory Commission, and several other state utility

commissions. In accordance with Rule 103-804 T.(1)(b) of the Commission's Rules of Practice and Procedure, Brickfield, Burchette, Ritts & Stone, P.C. will associate with Kevin Hall, Womble Carlyle Sandridge & Rice, LLP, 1727 Hampton Street, Columbia, SC 29201, local counsel licensed to practice in South Carolina. Service and correspondence regarding this proceeding should be sent to all of the undersigned.

WHEREFORE, for the reasons set forth above, CMC respectfully requests permission to intervene in this proceeding.

Respectfully submitted,

s/Kevin Hall

Kevin Hall, Esq.  
Womble Carlyle Sandridge & Rice, LLP  
1727 Hampton Street  
Columbia, SC 29201  
(803) 454-7710

*Local Counsel for CMC Steel South Carolina*

December 8, 2014

cc: Damon E. Xenopoulos, Esq.  
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Washington, D.C. 20007  
(202) 342-0800

**BEFORE THE  
SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

**Docket No. 2015-2-E**

<b>In Re:</b>	)	
	)	
<b>Annual Review of Base Rates for Fuel</b>	)	
<b>Costs of South Carolina Electric and Gas</b>	)	<b>CERTIFICATE OF SERVICE</b>
<b>Company</b>	)	

This is to certify that I have caused to be served this day a copy of the *Petition to Intervene of CMC Steel South Carolina* via first-class mail, postage pre-paid, to the persons named below at the addresses set forth below:

Jeffrey M. Nelson, Counsel  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201

Scott Elliott, Esq.  
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1508 Lady Street  
Columbia, SC 29201

K. Chad Burgess, Associate General Counsel  
South Carolina Electric and Gas Company  
MC C222  
220 Operation Way  
Cayce, SC 29033

s/Kevin Hall

Kevin Hall, Esq.  
Womble Carlyle Sandridge & Rice, LLP  
1727 Hampton Street  
Columbia, SC 29201

*Local Counsel for CMC Steel South  
Carolina*

December 8, 2014